

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

KEDWIN PAYAMPS,

Plaintiff,

-v-

**PLAINTIFF’S FIRST SET OF
REQUESTS FOR ADMISSIONS
TO THE DEFENDANTS**

22-CV-0563 (AMD) (VMS)

THE CITY OF NEW YORK; MAYOR BILL DE
BLASIO; NEW YORK CITY POLICE
DEPARTMENT (“NYPD”) COMMISSIONER
DERMOT SHEA; NYPD CHIEF OF
DEPARTMENT TERENCE MONAHAN; NYPD
INSPECTOR JESSE LANCE; NYPD OFFICER
COREY JOHNSON; FIRST NAME UNKNOWN
(“FNU”) AUGUSTE (TAX I.D. 961629); AND
NYPD MEMBERS JOHN AND JANE DOES 1-7,

Defendants.

**PLAINTIFF’S FIRST SET OF REQUESTS FOR ADMISSIONS TO
DEFENDANTS**

Plaintiff incorporates by reference the “INSTRUCTIONS” and “DEFINITIONS”
sections of Plaintiff’s First Set of Interrogatories and Requests for Production of
Documents dated September 20, 2022.

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure and the Local
Civil Rules for the Eastern District of New York, Plaintiff, by his attorney, Jessica
Massimi, hereby demands that the Defendants respond in writing and under oath, within
thirty days after service hereof, to the following requests for admissions.

To the extent you object to a particular Request for Admission (“RFA”) based on
its styling as such, please respond to the same as if it were an interrogatory or other
discovery demand.

THE REQUESTS FOR ADMISSIONS

1. Sergeant Kitwane Lewis was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.
2. Sergeant Kitwane Lewis was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.
3. Sergeant Kitwane Lewis was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.
4. Sergeant Kitwane Lewis was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.
5. Sergeant Kitwane Lewis observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.
6. Sergeant Kitwane Lewis spoke with Kedwin Payamps on June 4, 2020.
7. Sergeant Kitwane Lewis gave an order or command to Kedwin Payamps on June 4, 2020.
8. Sergeant Kitwane Lewis physically touched Kedwin Payamps on June 4, 2020.
9. Sergeant Kitwane Lewis used force on Kedwin Payamps on June 4, 2020.
10. Sergeant Kitwane Lewis heard another NYPD member speak with Kedwin Payamps on June 4, 2020.
11. Sergeant Kitwane Lewis heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

12. Sergeant Kitwane Lewis observed another NYPD member touch Kedwin Payamps on June 4, 2020.

13. Sergeant Kitwane Lewis observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

14. Sergeant Kitwane Lewis has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

15. Sergeant Kitwane Lewis received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

16. Sergeant Kitwane Lewis received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

17. Officer Matthew Erdman was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

18. Officer Matthew Erdman was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

19. Officer Matthew Erdman was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

20. Officer Matthew Erdman was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

21. Officer Matthew Erdman observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

22. Officer Matthew Erdman spoke with Kedwin Payamps on June 4, 2020.

23. Officer Matthew Erdman gave an order or command to Kedwin Payamps on June 4, 2020.

24. Officer Matthew Erdman physically touched Kedwin Payamps on June 4, 2020.

25. Officer Matthew Erdman used force on Kedwin Payamps on June 4, 2020.

26. Officer Matthew Erdman heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

27. Officer Matthew Erdman heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

28. Officer Matthew Erdman observed another NYPD member touch Kedwin Payamps on June 4, 2020.

29. Officer Matthew Erdman observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

30. Officer Matthew Erdman has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

31. Officer Matthew Erdman received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

32. Officer Matthew Erdman received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

33. Officer Kevin Forrester was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

34. Officer Kevin Forrester was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

35. Officer Kevin Forrester was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

36. Officer Kevin Forrester was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

37. Officer Kevin Forrester observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

38. Officer Kevin Forrester spoke with Kedwin Payamps on June 4, 2020.

39. Officer Kevin Forrester gave an order or command to Kedwin Payamps on June 4, 2020.

40. Officer Kevin Forrester physically touched Kedwin Payamps on June 4, 2020.

41. Officer Kevin Forrester used force on Kedwin Payamps on June 4, 2020.

42. Officer Kevin Forrester heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

43. Officer Kevin Forrester heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

44. Officer Kevin Forrester observed another NYPD member touch Kedwin Payamps on June 4, 2020.

45. Officer Kevin Forrester observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

46. Officer Kevin Forrester has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

47. Officer Kevin Forrester received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

48. Officer Kevin Forrester received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

49. Officer Luis Alicea was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

50. Officer Luis Alicea was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

51. Officer Luis Alicea was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

52. Officer Luis Alicea was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

53. Officer Luis Alicea observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

54. Officer Luis Alicea spoke with Kedwin Payamps on June 4, 2020.

55. Officer Luis Alicea gave an order or command to Kedwin Payamps on June 4, 2020.

56. Officer Luis Alicea physically touched Kedwin Payamps on June 4, 2020.

57. Officer Luis Alicea used force on Kedwin Payamps on June 4, 2020.

58. Officer Luis Alicea heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

59. Officer Luis Alicea heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

60. Officer Luis Alicea observed another NYPD member touch Kedwin Payamps on June 4, 2020.

61. Officer Luis Alicea observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

62. Officer Luis Alicea has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

63. Officer Luis Alicea received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

64. Officer Luis Alicea received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

65. Officer Clifford Perch was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

66. Officer Clifford Perch was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

67. Officer Clifford Perch was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

68. Officer Clifford Perch was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

69. Officer Clifford Perch observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

70. Officer Clifford Perch spoke with Kedwin Payamps on June 4, 2020.

71. Officer Clifford Perch gave an order or command to Kedwin Payamps on June 4, 2020.

72. Officer Clifford Perch physically touched Kedwin Payamps on June 4, 2020.

73. Officer Clifford Perch used force on Kedwin Payamps on June 4, 2020.

74. Officer Clifford Perch heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

75. Officer Clifford Perch heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

76. Officer Clifford Perch observed another NYPD member touch Kedwin Payamps on June 4, 2020.

77. Officer Clifford Perch observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

78. Officer Clifford Perch has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

79. Officer Clifford Perch received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

80. Officer Clifford Perch received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

81. Sergeant Alexis Yanez was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

82. Sergeant Alexis Yanez was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

83. Sergeant Alexis Yanez was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

84. Sergeant Alexis Yanez was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

85. Sergeant Alexis Yanez observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

86. Sergeant Alexis Yanez spoke with Kedwin Payamps on June 4, 2020.

87. Sergeant Alexis Yanez gave an order or command to Kedwin Payamps on June 4, 2020.

88. Sergeant Alexis Yanez physically touched Kedwin Payamps on June 4, 2020.

89. Sergeant Alexis Yanez used force on Kedwin Payamps on June 4, 2020.

90. Sergeant Alexis Yanez heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

91. Sergeant Alexis Yanez heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

92. Sergeant Alexis Yanez observed another NYPD member touch Kedwin Payamps on June 4, 2020.

93. Sergeant Alexis Yanez observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

94. Sergeant Alexis Yanez has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

95. Sergeant Alexis Yanez received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

96. Sergeant Alexis Yanez received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

97. Sergeant Christophe Battaglia was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

98. Sergeant Christophe Battaglia was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

99. Sergeant Christophe Battaglia was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

100. Sergeant Christophe Battaglia was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

101. Sergeant Christophe Battaglia observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

102. Sergeant Christophe Battaglia spoke with Kedwin Payamps on June 4, 2020.

103. Sergeant Christophe Battaglia gave an order or command to Kedwin Payamps on June 4, 2020.

104. Sergeant Christophe Battaglia physically touched Kedwin Payamps on June 4, 2020.

105. Sergeant Christophe Battaglia used force on Kedwin Payamps on June 4, 2020.

106. Sergeant Christophe Battaglia heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

107. Sergeant Christophe Battaglia heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

108. Sergeant Christophe Battaglia observed another NYPD member touch Kedwin Payamps on June 4, 2020.

109. Sergeant Christophe Battaglia observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

110. Sergeant Christophe Battaglia has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

111. Sergeant Christophe Battaglia received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

112. Sergeant Christophe Battaglia received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

113. Officer Casey Coglianese was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

114. Officer Casey Coglianese was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

115. Officer Casey Coglianese was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

116. Officer Casey Coglianese was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

117. Officer Casey Coglianese observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

118. Officer Casey Coglianese spoke with Kedwin Payamps on June 4, 2020.

119. Officer Casey Coglianese gave an order or command to Kedwin Payamps on June 4, 2020.

120. Officer Casey Coglianese physically touched Kedwin Payamps on June 4, 2020.

121. Officer Casey Coglianese used force on Kedwin Payamps on June 4, 2020.

122. Officer Casey Coglianese heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

123. Officer Casey Coglianese heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

124. Officer Casey Coglianese observed another NYPD member touch Kedwin Payamps on June 4, 2020.

125. Officer Casey Coglianese observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

126. Officer Casey Coglianese has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

127. Officer Casey Coglianese received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

128. Officer Casey Coglianese received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

129. Deputy Inspector William Glynn was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

130. Deputy Inspector William Glynn was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

131. Deputy Inspector William Glynn was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

132. Deputy Inspector William Glynn was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

133. Deputy Inspector William Glynn observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

134. Deputy Inspector William Glynn spoke with Kedwin Payamps on June 4, 2020.

135. Deputy Inspector William Glynn gave an order or command to Kedwin Payamps on June 4, 2020.

136. Deputy Inspector William Glynn physically touched Kedwin Payamps on June 4, 2020.

137. Deputy Inspector William Glynn used force on Kedwin Payamps on June 4, 2020.

138. Deputy Inspector William Glynn heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

139. Deputy Inspector William Glynn heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

140. Deputy Inspector William Glynn observed another NYPD member touch Kedwin Payamps on June 4, 2020.

141. Deputy Inspector William Glynn observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

142. Deputy Inspector William Glynn has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

143. Deputy Inspector William Glynn received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

144. Deputy Inspector William Glynn received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

145. Deputy Inspector Timothy Skretch was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

146. Deputy Inspector Timothy Skretch was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

147. Deputy Inspector Timothy Skretch was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

148. Deputy Inspector Timothy Skretch was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

149. Deputy Inspector Timothy Skretch observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

150. Deputy Inspector Timothy Skretch spoke with Kedwin Payamps on June 4, 2020.

151. Deputy Inspector Timothy Skretch gave an order or command to Kedwin Payamps on June 4, 2020.

152. Deputy Inspector Timothy Skretch physically touched Kedwin Payamps on June 4, 2020.

153. Deputy Inspector Timothy Skretch used force on Kedwin Payamps on June 4, 2020.

154. Deputy Inspector Timothy Skretch heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

155. Deputy Inspector Timothy Skretch heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

156. Deputy Inspector Timothy Skretch observed another NYPD member touch Kedwin Payamps on June 4, 2020.

157. Deputy Inspector Timothy Skretch observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

158. Deputy Inspector Timothy Skretch has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

159. Deputy Inspector Timothy Skretch received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

160. Deputy Inspector Timothy Skretch received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

161. Captain Ryon Malcolm was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

162. Captain Ryon Malcolm was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

163. Captain Ryon Malcolm was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

164. Captain Ryon Malcolm was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

165. Captain Ryon Malcolm observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

166. Captain Ryon Malcolm spoke with Kedwin Payamps on June 4, 2020.

167. Captain Ryon Malcolm gave an order or command to Kedwin Payamps on June 4, 2020.

168. Captain Ryon Malcolm physically touched Kedwin Payamps on June 4, 2020.

169. Captain Ryon Malcolm used force on Kedwin Payamps on June 4, 2020.

170. Captain Ryon Malcolm heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

171. Captain Ryon Malcolm heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

172. Captain Ryon Malcolm observed another NYPD member touch Kedwin Payamps on June 4, 2020.

173. Captain Ryon Malcolm observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

174. Captain Ryon Malcolm has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

175. Captain Ryon Malcolm received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

176. Captain Ryon Malcolm received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

177. Officer Janelle Nerette was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

178. Officer Janelle Nerette was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

179. Officer Janelle Nerette was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

180. Officer Janelle Nerette was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

181. Officer Janelle Nerette observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

182. Officer Janelle Nerette spoke with Kedwin Payamps on June 4, 2020.

183. Officer Janelle Nerette gave an order or command to Kedwin Payamps on June 4, 2020.

184. Officer Janelle Nerette physically touched Kedwin Payamps on June 4, 2020.

185. Officer Janelle Nerette used force on Kedwin Payamps on June 4, 2020.

186. Officer Janelle Nerette heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

187. Officer Janelle Nerette heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

188. Officer Janelle Nerette observed another NYPD member touch Kedwin Payamps on June 4, 2020.

189. Officer Janelle Nerette observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

190. Officer Janelle Nerette has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

191. Officer Janelle Nerette received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

192. Officer Janelle Nerette received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

193. Captain Danny Murria was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

194. Captain Danny Murria was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

195. Captain Danny Murria was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

196. Captain Danny Murria was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

197. Captain Danny Murria observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

198. Captain Danny Murria spoke with Kedwin Payamps on June 4, 2020.

199. Captain Danny Murria gave an order or command to Kedwin Payamps on June 4, 2020.

200. Captain Danny Murria physically touched Kedwin Payamps on June 4, 2020.

201. Captain Danny Murria used force on Kedwin Payamps on June 4, 2020.

202. Captain Danny Murria heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

203. Captain Danny Murria heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

204. Captain Danny Murria observed another NYPD member touch Kedwin Payamps on June 4, 2020.

205. Captain Danny Murria observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

206. Captain Danny Murria has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

207. Captain Danny Murria received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

208. Captain Danny Murria received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

209. Lieutenant Randy Shapiro was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

210. Lieutenant Randy Shapiro was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

211. Lieutenant Randy Shapiro was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

212. Lieutenant Randy Shapiro was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

213. Lieutenant Randy Shapiro observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

214. Lieutenant Randy Shapiro spoke with Kedwin Payamps on June 4, 2020.

215. Lieutenant Randy Shapiro gave an order or command to Kedwin Payamps on June 4, 2020.

216. Lieutenant Randy Shapiro physically touched Kedwin Payamps on June 4, 2020.

217. Lieutenant Randy Shapiro used force on Kedwin Payamps on June 4, 2020.

218. Lieutenant Randy Shapiro heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

219. Lieutenant Randy Shapiro heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

220. Lieutenant Randy Shapiro observed another NYPD member touch Kedwin Payamps on June 4, 2020.

221. Lieutenant Randy Shapiro observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

222. Lieutenant Randy Shapiro has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

223. Lieutenant Randy Shapiro received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

224. Lieutenant Randy Shapiro received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

225. Deputy Inspector Randy Noonan was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

226. Deputy Inspector Randy Noonan was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

227. Deputy Inspector Randy Noonan was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

228. Deputy Inspector Randy Noonan was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

229. Deputy Inspector Randy Noonan observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

230. Deputy Inspector Randy Noonan spoke with Kedwin Payamps on June 4, 2020.

231. Deputy Inspector Randy Noonan gave an order or command to Kedwin Payamps on June 4, 2020.

232. Deputy Inspector Randy Noonan physically touched Kedwin Payamps on June 4, 2020.

233. Deputy Inspector Randy Noonan used force on Kedwin Payamps on June 4, 2020.

234. Deputy Inspector Randy Noonan heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

235. Deputy Inspector Randy Noonan heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

236. Deputy Inspector Randy Noonan observed another NYPD member touch Kedwin Payamps on June 4, 2020.

237. Deputy Inspector Randy Noonan observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

238. Deputy Inspector Randy Noonan has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

239. Deputy Inspector Randy Noonan received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

240. Deputy Inspector Randy Noonan received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

241. Sergeant Jason Reisgerzog was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

242. Sergeant Jason Reisgerzog was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

243. Sergeant Jason Reisgerzog was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

244. Sergeant Jason Reisgerzog was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

245. Sergeant Jason Reisgerzog observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

246. Sergeant Jason Reisgerzog spoke with Kedwin Payamps on June 4, 2020.

247. Sergeant Jason Reisgerzog gave an order or command to Kedwin Payamps on June 4, 2020.

248. Sergeant Jason Reisgerzog physically touched Kedwin Payamps on June 4, 2020.

249. Sergeant Jason Reisgerzog used force on Kedwin Payamps on June 4, 2020.

250. Sergeant Jason Reisgerzog heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

251. Sergeant Jason Reisgerzog heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

252. Sergeant Jason Reisgerzog observed another NYPD member touch Kedwin Payamps on June 4, 2020.

253. Sergeant Jason Reisgerzog observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

254. Sergeant Jason Reisgerzog has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

255. Sergeant Jason Reisgerzog received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

256. Sergeant Jason Reisgerzog received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

257. Officer Andrae Fernandez was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

258. Officer Andrae Fernandez was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

259. Officer Andrae Fernandez was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

260. Officer Andrae Fernandez was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

261. Officer Andrae Fernandez observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

262. Officer Andrae Fernandez spoke with Kedwin Payamps on June 4, 2020.

263. Officer Andrae Fernandez gave an order or command to Kedwin Payamps on June 4, 2020.

264. Officer Andrae Fernandez physically touched Kedwin Payamps on June 4, 2020.

265. Officer Andrae Fernandez used force on Kedwin Payamps on June 4, 2020.

266. Officer Andrae Fernandez heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

267. Officer Andrae Fernandez heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

268. Officer Andrae Fernandez observed another NYPD member touch Kedwin Payamps on June 4, 2020.

269. Officer Andrae Fernandez observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

270. Officer Andrae Fernandez has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

271. Officer Andrae Fernandez received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

272. Officer Andrae Fernandez received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

273. Officer Nathaniel Lester was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

274. Officer Nathaniel Lester was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

275. Officer Nathaniel Lester was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

276. Officer Nathaniel Lester was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

277. Officer Nathaniel Lester observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

278. Officer Nathaniel Lester spoke with Kedwin Payamps on June 4, 2020.

279. Officer Nathaniel Lester gave an order or command to Kedwin Payamps on June 4, 2020.

280. Officer Nathaniel Lester physically touched Kedwin Payamps on June 4, 2020.

281. Officer Nathaniel Lester used force on Kedwin Payamps on June 4, 2020.

282. Officer Nathaniel Lester heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

283. Officer Nathaniel Lester heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

284. Officer Nathaniel Lester observed another NYPD member touch Kedwin Payamps on June 4, 2020.

285. Officer Nathaniel Lester observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

286. Officer Nathaniel Lester has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

287. Officer Nathaniel Lester received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

288. Officer Nathaniel Lester received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

289. Sergeant Kevin Lynch was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

290. Sergeant Kevin Lynch was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

291. Sergeant Kevin Lynch was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

292. Sergeant Kevin Lynch was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

293. Sergeant Kevin Lynch observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

294. Sergeant Kevin Lynch spoke with Kedwin Payamps on June 4, 2020.

295. Sergeant Kevin Lynch gave an order or command to Kedwin Payamps on June 4, 2020.

296. Sergeant Kevin Lynch physically touched Kedwin Payamps on June 4, 2020.

297. Sergeant Kevin Lynch used force on Kedwin Payamps on June 4, 2020.

298. Sergeant Kevin Lynch heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

299. Sergeant Kevin Lynch heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

300. Sergeant Kevin Lynch observed another NYPD member touch Kedwin Payamps on June 4, 2020.

301. Sergeant Kevin Lynch observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

302. Sergeant Kevin Lynch has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

303. Sergeant Kevin Lynch received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

304. Sergeant Kevin Lynch received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

305. Officer Jorge Ramos was on duty working a shift as an NYPD member on June 4, 2020 when the events depicted in DEF 327 occurred.

306. Officer Jorge Ramos was present near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

307. Officer Jorge Ramos was within 15 feet of Defendant Lance near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when the events depicted in DEF 327 occurred on June 4, 2020.

308. Officer Jorge Ramos was within 10 feet of Plaintiff when he was arrested near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York when Plaintiff was arrested on June 4, 2020.

309. Officer Jorge Ramos observed Kedwin Payamps near the intersection of Washington Avenue and Fulton Street in Brooklyn, New York on June 4, 2020.

310. Officer Jorge Ramos spoke with Kedwin Payamps on June 4, 2020.

311. Officer Jorge Ramos gave an order or command to Kedwin Payamps on June 4, 2020.

312. Officer Jorge Ramos physically touched Kedwin Payamps on June 4, 2020.

313. Officer Jorge Ramos used force on Kedwin Payamps on June 4, 2020.

314. Officer Jorge Ramos heard another NYPD member speak with Kedwin Payamps on June 4, 2020.

315. Officer Jorge Ramos heard another NYPD member give an order or command to Kedwin Payamps on June 4, 2020.

316. Officer Jorge Ramos observed another NYPD member touch Kedwin Payamps on June 4, 2020.

317. Officer Jorge Ramos observed another NYPD member use force on Kedwin Payamps on June 4, 2020.

318. Officer Jorge Ramos has Personal Knowledge related to a use of force against Kedwin Payamps on June 4, 2020.

319. Officer Jorge Ramos received information from another person regarding NYPD use of force on Kedwin Payamps on June 4, 2020.

320. Officer Jorge Ramos received information from another person regarding NYPD interactions with Kedwin Payamps on June 4, 2020.

Dated: Queens, NY
April 18, 2022

Very Truly Yours,

/S/

By:

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